

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

===== :  
CHARLES JOHNSON, :  
Plaintiff, :  
: :  
: :

— *versus* —

CLEARVIEW AI, INC., HOAN :  
TON-THAT, RICHARD SCHWARTZ, :  
Defendants. :  
===== :

23-cv-02441-KPF

COUNTERCLAIM DEFENDANT'S  
ANSWER TO DEFENDANTS'  
COUNTERCLAIMS

Counterclaim Defendant CHARLES JOHNSON, by and through his attorney of record,  
Bernard V. Kleinman, does respectfully respond to Counterclaim Plaintiffs, as follows:

A. Admits the allegations in Counterclaim ¶¶ 5, 29, 36.

B. Neither Admits nor Denies the allegations in Counterclaim ¶¶ 2, 3, 4, 6, 7, 8, 9, 10, 11,  
12, 13, 14, 15, 16, 17, 18, 19a, 19b, 19c, 19d, 19e, 30, 33, 37, 38, 40, 42, 43, 48, 52, 53.

C. Denies the allegations in Counterclaim ¶¶ 1, 31, 32, 34, 35, 39, 41, 44, 45, 46, 47, 49,  
50, 51, 55, 56, 57, 58, 59, 60.

D. Neither Admits nor Denies the allegations as the Document speaks for itself in  
Counterclaim ¶¶ 20, 21, 22, 23, 24, 25, 26, 27, 28, 54.

Dated: July 26, 2024  
Somers, NY

Respectfully submitted,  
Law Office of Bernard V. Kleinman, PLLC

/s/ Bernard V. Kleinman

Bernard V. Kleinman, Esq.  
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